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EPPING FOREST DISTRICT COUNCIL: EXAMINATION OF THE DISTRICT LOCAL PLAN EIP PRE-HEARING STATEMENT: MATTER 5

Introduction

Our client, Dr JHT Challis Trustees, owns Pound Field, Bell Common. A map showing our client's ownership is attached as [Appendix 1](#). The site is suitable, available and deliverable for residential development.

In our client's view, the current plan is unsound because the proposed housing allocations for Epping are not the most suitable sites when considered against reasonable alternatives, the draft plan is therefore not justified. The draft plan is also not consistent with national policy as the most sustainable sites have not been chosen.

As part of the strategic review of housing in Epping, consideration should be given to including Bell Common within the Epping boundary. The background evidence base is unsound because this has not been considered.

Our response to questions raised by Inspector in relation to Matter 5 is set out below:

Issue 1: Have the Plan's housing allocations been chosen on the basis of a robust assessment process?

Question 1 of Issue 1 mainly refers to the process by which housing allocations were selected. We have reviewed the evidence base in detail and are of view that the Site Selection Methodology (SSM) utilised in the Site Selection Report is not robust. In our view, there is no evidence of sufficient justification and clear explanation for the site selection decisions, which is a fundamental omission in the preparation process putting the soundness of the Local Plan in question.

The NPPF encourages re-use of previously developed land (brownfield land) that contributes to meeting an identified affordable housing need (Paragraph 145 of the NPPF). Pound Field meets the definition of brownfield land as set out in the revised NPPF. The site partially contains development and grazing area used for equestrian purposes, including stables and a manege. As such, a significant weight should have been attached to this fact during the preparation of the Local Plan.

Pound Field adjoins Bell Common, a residential street which forms part of Epping. It is a sustainable location, within easy walking distance of several bus stops on Bell Common and the High Road, with links to the centre of Epping, St. Margrets Hospital, Waltham Cross and Lakeside. It is also within cycling distance of Epping Town Centre and Epping Underground Station. Given that Pound Field adjoins existing residential development at Bell Common, which should be considered to form part of Epping, it is far better to bring forward development on brownfield land than on undeveloped predominantly agricultural greenfield such as EPP.R1 and site EPP.R2, now part of 'South Epping'. The draft Plan does not justify on what basis those two sites have been selected over Pound Field in Council's approach to prioritising the re-use of brownfield sites.

In addition, the proposed development at Pound Field would have a lesser impact on the green belt than the proposed extension to the south of Epping. With Bell Common taken into consideration, Pound Field is no further north, east, south or west than existing housing development. Indeed, this is recognised in Figure 4.3 of the Epping Forest Green Belt Study which finds that the area of Pound Field only performs a 'moderate' function in relation to Green Belt Purpose 3 'Assist in safeguarding the countryside from encroachment' compared with land to the south of Epping which performs a 'strong' function. Furthermore, it is unclear why this function of the green belt is given lesser weight than the other functions.

Part e of question 1 (Issue 1) is as follows:

"Was any other evidence taken into account in the site selection process? In particular, how has the historic environment been taken into account? Have Historic Impact Assessments been undertaken as recommended by Historic England and, if not, is this necessary?"

There appears to be no evidence that the Ecological Appraisal by Greengage, which we submitted with the Community Choices Consultation has been taken into account during the site selection process. The report concluded that development of areas of the site could be developed without having significant ecological impact, subject to inclusion of mitigation measures.

We note that Pound Field is well connected to existing housing around Bell Common, which we consider forms part of Epping, even though it is outside of the current boundary line.

In summary, it is our opinion that Pound Field has been miss-assessed and the score it received during stage 2 consultation is not its true representation. As such, we consider that the strategic review of housing in Epping is unsound.

In addition, the ARUP Assessment Pound Field scored positively in relation to its distance to the nearest bus stop, employment opportunities and schools. It also scores neutrally in relation to distance to the nearest rail/tube, local amenities and GP surgery. This is better than some of the designated sites such as Land at Ivy Chimneys Road (EPP.R1) and Land to the South of Brook Road (EPP.R2). Pound Field should therefore be considered a sustainable location.

Furthermore, the Report on Site Selection – Stage 2 Assessment 2016 (Appendix B1) prepared by ARUP states that "a negligible part of the site contains public open space. Site adjacent to existing public open space and could provide opportunities to improve access to Epping Forest". The development of the site would not only improve access to Epping Forest but also will provide opportunities to enhance the adjacent open space and the existing green belt for outdoor sport and recreation important for the health and well-being of communities, which is in accordance with the Paragraph 96 and Paragraph 141 of the NPPF.

Question 2 (Issue 1) states:

"How were the conclusions reached about individual sites checked for accuracy and consistency? Were sites visited or were they assessed through a desktop process? What has been done to check the assessments in specific cases where their accuracy has been challenged e.g. Site SR-0596? (Reps 19LAD0012)".

We have reviewed the evidence base on the Council's website and are unable to find sufficient evidence on how the individual sites have been checked for accuracy and consistency. There is also no evidence what has been done to review the assessments in respect of specific cases. In this context, we are of view that the draft Local Plan in its current form is not justified as it is not based on the sufficient evidence base. The Local

Plan has not been positively prepared as it unnecessarily restricts housing delivery on potential alternative sites.

Question 6 (Issue 1) states:

“Is it justified to allocate station car parks (EPP.R3; LOU.R1, LOU.R2; BUCK.R2; THYB.R2) and other car parks (EPP.R6, EPP.R7) for housing? Can adequate parking for both commuters and residents be provided; and how will short-term disruption to commuter parking during the construction phase be addressed?”

The deliverability of some of the other sites chosen within the existing built up area of Epping is very questionable. Particularly the sports centre site (EPP.R5) which requires that development will not take place until an alternative sports/leisure facility is delivered and operational and Cottis Lane car park and Bakers Lane car park (EPP.R6 and R7) which require reprovision of the same number of spaces to achieve a relatively small number of dwellings.

Given the high demand on parking in the District Council, it is very concerning that a number of car parks including station car parks have been allocated for housing in the draft Local Plan. It is important to note that the continued development of Epping has seen a growth in a number of commuters, which caused the station car parks being heavily used on a daily basis. Failure in providing those much need car parking facilities as a result of redevelopment of the existing car parks for housing will have significant impacts on the station traffic, parking, local road network, pedestrians, cyclists, public transport users and the local community. It is important to remember that any new development itself will result in additional demand for parking spaces and it is not clear from the evidence supplied what the long and short-term implications of this would be.

It should be noted that the short-term construction effect generated by the development will also be very significant and will result in many disruptions. Again, the evidence base used during the plan preparation process does not offer any transparency on this matter. Developing brownfield sites such as Pound Field, which is located a bit further away from the town centre but is adjacent to the existing housing provides an adequate alternative which will allow to mitigate negative impacts of the development on facilities and infrastructure provision.

Soundness of the Local Plan

Since the draft local plan was developed and since Call for Sites Consultation has taken place, the Government have published a new National Planning Policy Framework (NPPF). The revised NPPF replaces the previous 2012 NPPF and now provides overarching planning policy guidance for England (which also refers to plan-making, and the Green Belt review process).

Paragraph 35 of the NPPF (2018) explains criteria on which local plans are considered sound.

In context of the above guidance, our client is concerned that there is no evidence that the draft Local Plan has been fully justified. As such, we are of view that during the plan preparation the Council has not examined the appropriateness of alternative sites in the full capacity.

The draft Plan is also contrary with Paragraph 139 of the NPPF. Our client's site at Pound Field, Bell Common is surrounded by the residential properties and it is clear that the proposed residential use would be consistent with the local context and will also boost the supply of homes in the area. Instead, the draft Local Plan unnecessarily places constraints by restricting the new development and use of the site.

With this in mind, we consider the plan as currently drafted is unsound as the sites proposed to be allocated in Epping are not the most sustainable when considered against reasonable alternatives, such as Pound Field.

Appendix 1: Site Location Plan

Site Location Plan - Pound Field, Bell Common, Epping



Ordnance Survey

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